

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN)
---	-----------------------

This document relates to:

*Audrey Ades, et al. v. Islamic Republic of Iran*, No. 1:18-cv-07306 (GBD)(SN)

**MOVING PLAINTIFF’S NOTICE OF MOTION FOR PARTIAL FINAL DAMAGES  
JUDGMENT**

PLEASE TAKE NOTICE that upon the Declaration of Jerry S. Goldman, Esq. (“Goldman Declaration”) and exhibits annexed thereto, and the exhibits submitted with access restricted to the Court pursuant to the May 5, 2022 Order, ECF No. 7963, pertaining to expert reports submitted in support of default judgments, the Estate of Tamara Thurman, which is identified in Exhibit A annexed to the Goldman Declaration (which is Exhibit B to the Proposed Order) (“Moving Plaintiff”),<sup>1</sup> by and through counsel, Anderson Kill P.C., respectfully moves this Court for an ORDER:

(1) awarding the Moving Plaintiff identified in Exhibit A a damages judgment against the Islamic Republic of Iran (“Iran”); AND,

(2) awarding the Moving Plaintiff, through its personal representative and on behalf of all survivors and all legally entitled beneficiaries and family members of such 9/11 decedent, as identified in Exhibit A, an award of economic damages in the amount set forth in Exhibit A; AND,

(3) awarding the Moving Plaintiff identified in Exhibit A prejudgment interest at the rate of 4.96 percent per annum, compounded annually for the period from September 11, 2001 until the date of the damages judgment; AND,

---

<sup>1</sup> Moving Plaintiff previously sought economic damages as part of the judgment motion at ECF No. 9813, but the Court requested that undersigned counsel file a motion to substitute the personal representative of the estate, before moving for economic damages, which undersigned counsel has done at ECF No. 9937, and the present motion seeks relief assuming the Court grants that motion to substitute.

(4) granting the Moving Plaintiff identified in Exhibit A permission to seek punitive damages, economic damages, and other appropriate damages, at a later date, to the extent such awards have not previously been addressed; AND,

(5) granting permission for all other Plaintiffs in these actions not appearing in Exhibit A to submit applications for damages awards in later stages, to the extent such awards have not previously been addressed; AND,

(6) granting to the Moving Plaintiff in Exhibit A such other and further relief as this Honorable Court deems just and proper.

Plaintiff's request is made in connection with the judgment on default as to liability entered against Iran as set forth in Exhibit A to the Proposed Order.

Dated: New York, New York  
June 20, 2024

Respectfully submitted,

/s/ Jerry S. Goldman

ANDERSON KILL P.C.

Jerry S. Goldman, Esq.

Bruce E. Strong, Esq.

Alexander Greene, Esq.

1251 Avenue of the Americas

New York, NY 10020

Tel: (212) 279-1000

Fax: (212) 278-1733

Email: [jgoldman@andersonkill.com](mailto:jgoldman@andersonkill.com)

[bstrong@andersonkill.com](mailto:bstrong@andersonkill.com)

[agreene@andersonkill.com](mailto:agreene@andersonkill.com)

*Attorneys for Plaintiffs*